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201-16228

Attn: Chemical Right-to-Know Program
Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
(email: oppt.ncic@epa.gov, chem.rtk@epa.gov)

RE: Submission for HPV Challenge Program

Dear Sir or Madam:

Albemarle Corporation (sponsor registration # . . .) is pleased to submit the attached Category Justification, Robust Summary, and Test Plan documents (in Word ".doc" format) for the "Higher Alkenyl Succinic Anhydride (ASA)" category of compounds (covered by the HPV chemicals with CAS#s 32072-96-1) #28777-98-2, and EHPV chemical with CAS# 53520-67-5), as a voluntary participant in the HPV Challenge Program and as part of our ongoing commitment to product stewardship.

As referenced in our December 28, 2005 commitment letter to the HPV Challenge program, we understand that EPA will continue to recognize these as viable commitments, and that if necessary, additional testing will be conducted in the time frame established by the US EPA HPV Challenge Program. We also understand that the information and data we provide under the HPV Challenge Program will be reviewed and made publicly available.

We would like to notify EPA that Albemarle Corporation has very recently been contacted by another major manufacturer of the "Higher ASAs", as well as by the CHEMSTAR Director at the American Chemistry Council (ACC), with a proposal to work together and share information and resources in the interest of generating a more complete dossier. As this new collaboration develops, we plan on amending additional commitment documents for the sponsored chemicals as necessary in the upcoming weeks.

The technical contact for this submission to the U.S. EPA HPV program is:

Dr. Len Sweet, PhD, MPH, MSc.
Albemarle Corporation
Health, Safety & Environment
451 Florida Street
Baton Rouge, LA 70801-1765
225-202-3330 (phone)

Sincerely,

Len Sweet, **PhD**, MPH, **MSc**.
Global Product Stewardship Director



HigherASAsRobustSummaryMarch2006.doc HigherASAsCATEGORY JUSTIFICATIONMarch2006.doc